

**REMARKS**

The foregoing amendments and the following remarks are submitted in response to the Office Action dated December 5, 2006. By the present amendment, claims 23, 34, and 39 have been amended. Reconsideration and allowance of pending claims 23-43 in view of the amendments and the following remarks are respectfully requested.

The Office Action states that “building a dynamic grammar responsive to the determined coordinate location of [a] mobile device,” is well known in the art. (See, Office Action, Page 3). Applicant respectfully traverses this assertion and contends that it is not well known to those skilled in the art to build a dynamic grammar responsive to a determined coordinate location of a mobile device.

**Rejection of Claim 23 Under 35 U.S.C. 103**

In the Office Action, claim 23 was rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 5,524,169 (“Cohen”) in view of US Patent No. 6,314,402 (“Monaco”). With regard to independent claim 23, the Office Action states that Cohen teaches the limitations of claim 23, but does not teach “building a dynamic grammar . . .” (See, Office Action, Page 3). The Office Action further states that Monaco teaches “a method for creating modifiable and combinable speech objects in an interactive voice response system.” (See, Office Action, Page 3). The Office Action states that the combination of Cohen and Monaco makes claim 23 obvious. Applicant submits that claim 23 is patentable over the references of record.

The combination of the references does not teach, suggest, or yield all the limitations of the claimed method, *inter alia*, the present independent claim 23 (and its respective dependent claims) includes the following limitations:

using the determined coordinate location to obtain a subset of records from a plurality of records;  
and  
building a dynamic grammar responsive to the determined coordinate location of the mobile device using the subset of records;

Cohen does not teach dynamic grammars at all. (See, Office Action, Page 3). Monaco is directed to one of two types of grammars. A first type is generated by inserting or extending existing grammars, for example, by building “grammars that are created through a text or voice interface and then inserted at a fixed location in an existing grammar at runtime.” (See, Monaco, Column 10, Lines 64-66). This first type of grammar is a combination of records or prior grammars, so it is not obtained by “using a determined coordinate location to obtain a subset of records,” and furthermore, the dynamic grammar is not built “using the subset of the records.”

Similarly, the second type of grammar in Monaco is “created programmatically at runtime and then used directly for recognition.” (See, Monaco, Columns 10-11, Lines 65-66 and 1). Monaco does not provide any teaching as to how the grammar that is created programmatically at runtime is obtained, but clearly it is not obtained by “using a determined location to obtain a subset of records from a plurality of records,” and clearly, the dynamic grammar is not built “using the subset of the records.”

Moreover, the above limitations can provide the significant advantage of reducing the size of the grammar being applied for an utterance. This increases efficiency and the likelihood of a correct match.

Cohen does not teach dynamic grammars and Monaco’s teaching with regard to “dynamic grammars” is that they are “created through a text or voice interface and then inserted at a fixed location in an existing grammar at runtime.” (See, Monaco, Column 10, Lines 52-67).

For example, Monaco might use an individual's personal dialing list to insert additional names or phone numbers into the existing grammar. (See, Monaco, Column 10, Lines 1-5).

**Rejection of Claim 34 Under 35 U.S.C. 103**

In the Office Action, claim 34 was rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 5,524,169 ("Cohen") in view of US Patent No. 6,314,402 ("Monaco"). With regard to independent claim 34, the Office Action states that Cohen teaches the limitations of claims 23, but does not teach "building a dynamic grammar . . ." (See, Office Action, Page 3). The Office Action further states that Monaco teaches "a method for creating modifiable and combinable speech objects in an interactive voice response system." (See, Office Action, Page 3). The Office Action states that the combination of Cohen and Monaco makes claim 34 obvious. Applicant submits that claim 34 is patentable over the references of record.

The combination of the references does not teach, suggest, or yield all the limitations of the claimed method, *inter alia*, the present independent claim (and its respective dependent claims) includes the following limitations:

using the determined location to select a subset of records from a plurality of records;  
and  
building a dynamic grammar of information spatially related to the mobile device location based upon a distance around the determined location of the mobile device using the subset of records.

As stated above, Cohen does not teach dynamic grammars at all. (See, Office Action, Page 3). Monaco is directed to one of two types of grammars as described in subsection B, neither of which teaches the limitations shown above. Furthermore, claim 34 teaches that the dynamic grammar is built, "based upon a distance around the determined location of the mobile device." Monaco has no teaching whatsoever about using a distance around a determined

location of a mobile device to build a dynamic grammar. Rather, Monaco describes “inserting” data such as “contact lists” into existing grammars.

**Rejection of Claim 39 Under 35 U.S.C. 103**

In the Office Action, claim 39 was rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 5,524,169 Cohen in view of Monaco and in further view of US Patent No. 7,036,128 (“Julia”). With regard to claim independent claim 39, the Office Action states that Cohen teaches the limitations of claims 39, but does not teach “building a dynamic grammar . . .” The Office Action further states that Monaco teaches “the creation of dynamic grammars in situations where the items to be recognized are not fixed.” (See, Office Action, Page 11).

The Office Action further states that Cohen and Monaco do not teach “using the determined location of the mobile device to generate a user prompt, transmitting the user prompt to the mobile device, and capturing a vocal expression of a speaker utilizing the mobile device in response to the user prompt.” The Office Action states that Julia teaches those limitations and that the combination of Cohen, Monaco, and Julia makes the present claims obvious. Applicant submits that claim 39 is patentable over the references of record.

The combination of the references does not teach, suggest, or yield all the limitations of the claimed method, *inter alia*, the present independent claim (and its respective dependent claims) includes the following limitations:

using the determined location to select a subset of records from a plurality of records;  
and  
building a dynamic grammar in response to the determined location of the mobile device using the subset of records.

As stated above, Cohen does not teach dynamic grammars at all. (See, Office Action, Page 3). Monaco is directed to one of two types of grammars as described in above, neither of

which teaches the limitations shown above. Furthermore, Julia does not teach dynamic grammars either.

**Rejection of Claims 24-33, 35-38, and 40-43 Under 35 U.S.C. 103**

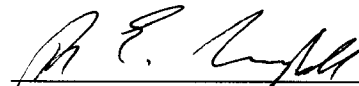
Claims 24-33, 35-38, and 40-43 are dependent claims. Claims 24-33 depend from independent claim 23. Claims 35-38 depend from independent claim 34. Claims 40-43 depend from independent claim 39. Applicant has argued that independent claims 23, 34, and 39 are in a condition for allowance. For at least the same reasons, dependent claims 24-33, 35-38, and 40-43 are in a condition for allowance as well.

**CONCLUSION**

The Applicant has endeavored to address all of the Examiner's concerns as expressed in the outstanding Office Action. In light of the above remarks, reconsideration and withdrawal of the outstanding rejections is specifically requested. If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to initiate the same with the undersigned.

Respectfully submitted,

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